UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

In re: Target Corporation Customer Data Security Breach Litigation

This document relates to the Financial Institution Cases.

MDL No. 14-2522 (PAM)

FINANCIAL INSTITUTION PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Financial Institution Plaintiffs, Umpqua Bank, Mutual Bank, Village Bank, CSE Federal Credit Union, and First Federal Savings of Lorain (collectively, "Plaintiffs"), by their counsel, hereby move this Court for entry of an Order granting final approval of class action settlement.

This Motion is based on the record in this case as well as: (1) Financial Institution Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Class Action Settlement; (2) the Declaration of Charles S. Zimmerman in Support of Final Approval and attached exhibits; (3) the Declaration of Jeffrey D. Dahl with Respect Implementation of the Notice Plan and Performance of Required Settlement Administrator Activities and attached exhibits; and (4) the Proposed Final Judgment that are served and filed herewith, as well as any additional materials or argument that may be presented to the Court.

Dated: April 11, 2016

Respectfully submitted,

CHESTNUT CAMBRONNE PA

By: /s/ Karl L. Cambronne
Karl L. Cambronne (MN 14321)
Jeffrey D. Bores (MN 227699)
Bryan L. Bleichner (MN 0326689)
17 Washington Avenue North,
Suite 300
Minneapolis, MN 55401
Telephone: (612) 339-7300
kcambronne@chestnutcambronne.com
jbores@chestnutcambronne.com
bbleichner@chestnutcambronne.com

Coordinated Lead Counsel for Plaintiffs

ZIMMERMAN REED, LLP

By: /s/ Charles S. Zimmerman
Charles S. Zimmerman (MN 120054)
J. Gordon Rudd, Jr. (MN 222082)
Brian C. Gudmundson (MN 336695)
David M. Cialkowski, (MN 306526)
1100 IDS Center, 80 South 8th St.
Minneapolis, MN 55402
Telephone: (612) 341-0400
charles.zimmerman@zimmreed.com
gordon.rudd@zimmreed.com
brian.gudmundson@zimmreed.com
david.cialkowski@zimmreed.com

Lead Counsel for Financial Institution Plaintiffs